

The Executive Board
Alabama Association,
Public Safety Communication Officers
PO. Box 5383
Tuscaloosa, Alabama 35487
February 2, 1993

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FCC MAIL ROOM

Ms Donna Searcy
Secretary, FCC
1919 M Street NW
Washington, DC 20554

RE: FCC Docket 92-235 Frequency Re-Farming

Dear Ms Searcy:

The members of Alabama APCO and NENA are greatly concerned with the impact that will result from implementation of FCC Docket 92-235 dealing with Frequency Re-farming and eliminating the existing Part 90 Rules and Regulations. The realities imposed by these rule changes may provide spectrum efficiency in the VHF and UHF designated frequencies, but this will come at the expense of those agencies involved with serving Alabama's citizens in life-threatening and loss of property situations.

The State of Alabama, we believe, can be compared to those states with similar geography, topography, and population, as well as concerns about financial status, and educational reform. Who will benefit by these proposed rule changes? We believe the beneficiaries will be the private sector including RCC's (new and Old), radio equipment manufacturers, local radio maintenance shops, radio frequency coordination organizations, and possibly the FCC through increased filing fees and licensing costs. We believe that many of Alabama's Public Safety and Special Emergency agencies will not overcome the consequences of radio communications restructuring in the foreseeable future. Our thinking is based upon the following considerations appropriate to our states radio communication history, geography, population, political divisions, and our financial predicament.


In a number of respects this re-farming proposal is similar to the FCC's implementation of narrow band that occurred in the 1950's. Alabama's historical solution to the narrow band implementation problem was partially resolved with the infusion of LEPA funds in the 70's. In reality, it only pushed a limited number of Alabama's qualified Public Safety and Special Emergency agencies into VHF or UHF. Available dollars, again, was the limiting factor. It did not solve our Public Safety and Special Emergency radio communications problems. Instead it provided the basis for the existing problems resulting from Alabama's Public Safety and Special Emergency agencies' communications being spread through four frequency spectrum's instead of one.

Yes, we would all prefer going to 800 Mhz Trunked Radio, but we do not have the funding base to accomplish this in the foreseeable future. Alabama State government has experienced a form of fiscal proration for six (6) of the last ten (10) years. Our legislature has been unable to pass tax reform measures for education or anything else. Many local governments have passed increased sales taxes in their attempts to continue to provide the same level of services to their communities. From our point of view, the financial well is dry. Forced or coerced changes in national radio communication rules and regulations will neither increase emergency response communications in these times of recession, state proration, nor help alleviate our runaway national debt. We believe that these proposed changes will probably lessen our ability to serve our citizens.

Alabama's geography rises from two (2) feet above sea level to mountains approaching two thousand, seven hundred (2,700) feet, with valleys, gorges, mountain ranges, and various exposed minerals each a contributor to impeding radio communications. While we have not solved all of our radio communications problems, we have in the last twenty years, worked towards solutions based upon setting priorities based upon available funds. The FCC proposal destroys our existing abilities and incurs additional expense in maintaining the same levels of citizen services, and it may be detrimental to increasing our current ability to effectively or economically respond to citizens' life

threatening, casualty, or property needs. Obviously, the FCC is not encouraging planned migration from one system to another because when we reduce to 3 KHz deviation we will reduce our effective communication range by 40%. Other expected side effects will be seen in CTCSS and pager decoder failure, reduced talk back, no inter-agency inter-operability, which means unreliable communications systems for Public Safety.

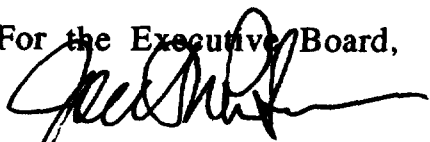
Alabama's population density, like our geography, ranges from counties with eleven thousand (11,000) people to the largest with six hundred and seventy thousand (670,000) people. The largest county includes thirty-two (32) separate political entities. With slightly more than three (3) million people in Alabama, a number of our agencies may cover several hundred miles within their jurisdictional boundaries. Small rural populations served by small under-funded servicing agencies who require many things in addition to workable, affordable, and building block approach using "old and new" in the development of



Existing radio interference intermodulation, and co-channel problems will not be resolved by allowing entities to file for adjacent channels. Single sideband radio equipment will not help us in terms of expense or in terms of inter-operability with existing radios. The concept of a single coordinating agency will be a political nightmare and the sharing a single coordination database (already filled with inaccuracies) does not inspire those who have recently filed for UHF frequencies.

The FCC approved Alabama State Plan for Public Safety and Special Emergency Radio Communications identified many of these same problems that FCC Docket 92-235 attempts to resolve. We agree the present situation is not effective and changes need to be made. But without a source for funding our Public Safety and Special Emergency agencies, the only positive change will be the FCC rules and regulations. Our understanding of Alabama's current radio communications leads us to believe that implementation of this proposal will assure that Alabama's Public Safety and Special Emergency radio communications will continue to lag behind as we compete with all the other pressing needs of our citizens. The implementation of these proposed rule changes will increase our liability for the service providers and citizens alike.

For the Executive Board,



Joel S. Whitman, Alabama Executive Committeeman
George Mangum, President Alabama APCO
Kyle Sewell, President Elect
Pat Hall, Second Vice President
Thomas Garrett, Advisor